

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Case No. 09-10243-MLW
)
)
v.)
)
RYAN HARRIS, a/k/a DerEngel,) 18 U.S.C. §§1343, 2 (Wire Fraud)
)
)
Defendant)
)

SUPERSEDING INDICTMENT

COUNTS ONE-EIGHT
(Wire Fraud)
18 U.S.C. §§1343 and 2

The Grand Jury charges that:

1. On or about the dates set forth below, in the District of Massachusetts and elsewhere,

RYAN HARRIS

having knowingly devised a scheme to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations and promises, transmitted and caused to be transmitted, in interstate commerce, wire communications, including writings, signals, and sounds, for the purpose of executing the scheme to defraud, and aided and abetted others in doing so, as set forth below.

Trial Count	Superseding Indictment Count	Approximate Date	Wire Transmission
1	2	2005	N.H. accessed the internet from Massachusetts and downloaded HARRIS's Sigma cable modem hacking product
2	3	2007	N.H. accessed the internet from Massachusetts and downloaded HARRIS's Sigma X cable modem hacking product
3	4	January 15, 2007	N.H. accessed the internet from Massachusetts, using HARRIS's products and a cloned MAC address, and participated in an online chat, discussing his hacking activities
4	5	December 5, 2007	N.H. accessed the internet from Massachusetts, using HARRIS's products and a cloned MAC address, and participated in an online chat, discussing his hacking activities
5	6	June 2008	J.L. accessed HARRIS's TCNISO website from Massachusetts and bought a modified cable modem and ancillary products
6	7	July 2008	J.L. accessed the internet from Massachusetts, using HARRIS's products and a cloned MAC address, and obtained free internet access
7	10	June 2009	W.M. accessed HARRIS's TCNISO website from Massachusetts and bought a modified cable modem and ancillary products
8	11	July 2009	W.M. accessed the internet from Massachusetts, using HARRIS's products and a cloned MAC address, and obtained free internet access

All in violation of 18 U.S.C. §§1343 and 2.

A TRUE BILL

Foreperson of the Grand Jury

Adam J. Bookbinder
Assistant United States Attorney
Mona Sedky
Trial Attorney, Department of Justice

DISTRICT OF MASSACHUSETTS May 18, 2011

Returned into the District Court by the Grand Jurors and filed.

Deputy Clerk